



failure to satisfy Defendants obligation to meet and confer with the NRA over the substance of their responses.

WHEREFORE, for good cause shown in the submissions filed with the Court, the NRA request the following relief:

1. An order striking or overruling of all of Defendants' General Objections
2. An order compelling production of all documents in light of the overruling of the General Objects and in response to the multiple, specific Requests for Product discussed in the memorandum.
3. An order sanctioning Defendants for the reasons set forth in the Memorandum pursuant to Fed. R. Civ. P. 37(d).

Dated: January 22, 2019

Respectfully submitted,

**BREWER, ATTORNEYS & COUNSELORS**

By: /s/ Jason C. McKenney

Michael J. Collins  
State Bar No. 00785493  
mjc@brewerattorneys.com  
Jason C. McKenney  
State Bar No. 24070245  
jcm@brewerattorneys.com

1717 Main Street, Suite 5900  
Dallas, Texas 75201  
Telephone: (214) 653-4000  
Facsimile: (214) 653-1015

**ATTORNEYS FOR THE PLAINTIFF-  
COUNTER-DEFENDANT NATIONAL  
RIFLE ASSOCIATION OF AMERICA**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was electronically served via the Court's electronic case filing system upon all counsel of record on this 22nd day of January 2019:

/s/ Jason C. McKenney  
Jason McKenney